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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et al.*, individually and  
on behalf of all similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF ALYSSA G. OLSON  
IN SUPPORT OF JOINT SUBMISSION  
RE: SEALING PORTIONS OF AUGUST  
5, 2022 ORDER ON (1) GOOGLE'S  
ADMINISTRATIVE MOTIONS FOR  
EXTENSION/ CLARIFICATION OF  
PRESERVATION PLAN ORDERS AND  
(2) CALHOUN PLAINTIFFS' MOTION  
FOR CLARIFICATION OF  
PRESERVATION PLAN ORDER (DKT.  
657)**

Referral: Hon. Susan van Keulen, USMJ

1 I, Alyssa G. Olson, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel  
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make  
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I  
5 could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of the Parties’  
7 Joint Submission Re: Sealing Portions of August 5, 2022 Order on (1) Google’s Administrative  
8 Motions for Extension/Clarification of Preservation Plan Order; and (2) *Calhoun* Plaintiffs’  
9 Administrative Motion for Clarification of the Preservation Plan Order (Dkt. 657) (“Order”). In  
10 making this request, Google has carefully considered the relevant legal standard and policy  
11 considerations outlined in Civil Local Rule 79-5. Google makes this request with the good faith  
12 belief that the information sought to be sealed consists of Google’s confidential and proprietary  
13 information and that public disclosure could cause competitive harm.

14 3. Google respectfully requests that the Court seal the redacted portion identified in the  
15 Order.

16 4. The information requested to be sealed contains non-public, sensitive confidential  
17 business information related to Google’s internal technological systems that could affect Google’s  
18 competitive standing and may expose Google to increased security risks if publicly disclosed,  
19 including internal data security measures, various types of Google’s internal projects, data signals,  
20 and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as  
21 confidential in the ordinary course of its business and is not generally known to the public or  
22 Google’s competitors.

23 5. Such confidential and proprietary information reveals Google’s internal strategies,  
24 system designs, and business practices for operating and maintaining many of its important services,  
25 and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 1-  
26 2.

27 6. Public disclosure of such confidential and proprietary information could affect  
28 Google’s competitive standing as competitors may alter their identifier system designs and practices

1 relating to competing products. It may also place Google at an increased risk of cyber security  
2 threats, as third parties may seek to use the information to compromise Google's data sources,  
3 including data logs, internal data structures and internal identifier systems.

4 7. On August 15, 2022, the parties conferred on the proposed redactions to the Order.  
5 Plaintiffs take no position on sealing the proposed redactions.

6 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
7 and correct. Executed in Los Angeles, California on August 15, 2022.

8  
9 DATED: August 15, 2022

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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11  
12 By /s/ Alyssa G. Olson  
Alyssa G. Olson

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14 *Attorney for Defendant*  
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